

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ROBERTO ALMODOVAR, JR.)	
)	Case No. 18-cv-02341
Plaintiff)	
)	
vs.)	Honorable Jeffrey I. Cummings
)	
)	
REYNALDO GUEVARA, EDWARD)	
MINGEY, ERNEST HALVORSEN)	
MARK OLSZEWSKI,)	JURY DEMAND
and CITY OF CHICAGO)	
)	
Defendants,)	

—

WILLIAM NEGRON)	
)	Case No. 18-cv-02701
Plaintiff)	
)	
vs.)	Honorable Jeffrey I. Cummings
)	
)	
REYNALDO GUEVARA, EDWARD)	JURY DEMAND
MINGEY, ERNEST HALVORSEN,))	
MARK OLSZEWSKI, and)	
CITY OF CHICAGO)	
)	
Defendants,)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANTS' MOTION FOR RECONSIDERATION [DKT. 281]**

Plaintiffs, by and through their respective attorneys, respectfully move this Honorable Court for an extension of time to file a response to Defendants City of Chicago and Mark Olszewski's Motion to Reconsider the Court's Summary Judgment Decision [Dkt. 281]. In support, Plaintiffs state as follows:

1. On January 10, 2025, this Court entered an order granting Defendant Olszewski's Motion for Summary Judgment as to Plaintiffs' federal claims and relinquished jurisdiction over the state law claims that Plaintiff asserted against Olszewski, dismissing those claims without prejudice. [Dkt. 276]

2. On March 14, 2025, Defendants City of Chicago and Mark Olszewski filed a motion for reconsideration of this Court's January 10, 2025 order. [Dkt. 281].

3. On March 17, 2025, this Court ordered Plaintiffs to file a joint response to Defendants City of Chicago and Olszewski's motion by March 31, 2025. [Dkt. 282].

4. Due to other professional obligations, Plaintiffs respectfully request a short extension of time until Friday, April 4, 2025, to file their joint opposition to Defendants' motion to reconsider.

5. Specifically, Plaintiff Almodovar's counsel is currently preparing replies to two Motions for Summary Judgment in the matter of *Maysonet v. Guevara, et. al.*, 2018-cv-02342 as well as preparing for a criminal trial which is scheduled to begin on April 15, 2025, in *People v. Harvey Weinstien*, IND-74118-24/001.

6. Counsel for Plaintiff Negron just completed a four-week trial before Judge Lefkow in *Fulton v. Bartik, et. al.*, 20-cv-03118 and *Mitchell v. Bartik, et. al.*, 20-cv-03119 which resulted in a verdict on March 10, 2025. Following that trial, counsel for Plaintiff Negron was out of the country until yesterday, March 30, 2025.

7. As such, Plaintiffs are requesting a short extension until Friday, April 4, 2025, to file their opposition.

8. Plaintiff does not bring this motion for any undue purpose or to delay.

9. Defendants have no objection to this request.

WHEREFORE, Plaintiffs Roberto Almodovar and William Negron respectfully request until April 4, 2025, to file his Opposition to Defendant's Motion to Reconsider.

Respectfully Submitted,

PLAINTIFF ROBERTO ALMODOVAR

By: /s/ Jennifer Bonjean

One of Plaintiff's attorneys

Jennifer Bonjean

Ashley Cohen

Bonjean Law Group, PLLC

303 Van Brunt Street, 1st Fl.

Brooklyn, New York 11231

718-875-1850

Chicago Office:

Bonjean Law Group, PLLC

53 W. Jackson Blvd., Ste. 315

Chicago, Illinois 60604

PLAINTIFF WILLIAM NEGRON

By: /s/ Russell Ainsworth

Arthur Loevy

Jon Loevy

Russell Ainsworth

LOEVY & LOEVY

311 N. Aberdeen, 3rd Floor

Chicago, Illinois 60607

(312) 243-5900

russell@loevy.com